

Adam P. Segal, Esq.
Nevada Bar No. 6120
Aaron B. Fricke, Esq.
Nevada Bar No. 11129
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
Off: (702) 382-2101
Fax: (702) 382-8135

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE TEAMSTERS
LOCAL 631 SECURITY FUND FOR
SOUTHERN NEVADA,

Plaintiff,

vs.

NATIONAL CONVENTION SERVICES, a
New York corporation revoked in the State
of Nevada; NATIONAL CONVENTION
SERVICES, a New York corporation doing
business in Nevada as NATIONAL
CONVENTION SERVICES; and
WESTERN SURETY COMPANY,

Defendants.

AND ALL RELATED CLAIMS.

CASE NO. 2:09-cv-02380-KJD-PAL

**NOTICE OF SETTLEMENT AND
REQUEST TO STAY PROCEEDINGS**

Plaintiff, Trustees of the Teamsters Local 631 Security Fund for Southern Nevada (“Security Fund”), and Defendant, Western Surety Company (“WSC”), by and through their counsel of record, hereby give notice to the court that the Security Fund and WSC have agreed to a settlement in this case. The parties are in the process of finalizing formal settlement documents, and intend to file a stipulation and order of dismissal within approximately thirty (30) days.

1 Because of the upcoming dismissal, the Security Fund and WSC respectfully request that the
2 Court stay consideration of Plaintiff's pending Motion for Summary Judgment against Western
3 Surety Company (ECF. No. 72) for thirty (30) days.

4 DATED this 12th day of September, 2011. DATED this 12th day of September, 2011.

5 BROWNSTEIN HYATT FARBER
6 SCHRECK, LLP

ANDERSON, MCPHARLIN & CONNERS, LLP

7 /s/ Aaron Fricke

/s/ Brian Bradford

8 Adam P. Segal, Esq.
9 Nevada Bar No. 6120
10 Aaron B. Fricke, Esq.
11 Nevada Bar No. 11129
12 100 North City Parkway, Suite 1600
13 Las Vegas, Nevada 89106-4614
14 Telephone: (702) 382-2101
15 Facsimile: (702) 382-8135

Brian L. Bradford, Esq.
Nevada Bar No. 9518
Carleton R. Burch, Esq.
Nevada Bar No. 10527
Anderson, McPharlin & Connors, LLP
777 North Rainbow Blvd., Suite 145
Las Vegas, Nevada 89107
blb@amclaw.com
crb@amclaw.com

16 Attorneys for Plaintiff

Attorneys for Western Surety Company

17 **IT IS SO ORDERED.**

18 

19 **DISTRICT COURT JUDGE**

20 **DATED:** 9 / 13, 2011

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

CERTIFICATE OF SERVICE

Pursuant to Federal Rules of Civil Procedure 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on this 12th day of September, 2011, I served true copy of the foregoing **NOTICE OF SETTLEMENT AND REQUEST TO STAY PROCEEDINGS** upon:

Jeffrey Winchester, Esq.
Shaun P. Haley, Esq.
Ogletree, Deakins, Nash, Smoak & Stewart
Wells Fargo Tower, Suite 1100
3880 Howard Hughes Parkway
Las Vegas, Nevada 89169
shaun.haley@ogletreedeakins.com

Attorneys for Defendant, National Convention Services

☒ a. **BY CM/ECF System**

☐ b. **BY U.S. MAIL** in a sealed envelope(s) mailed with postage thereon fully prepaid..

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ebony Davis

An Employee of Brownstein Hyatt Farber Schreck, LLP

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101